

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND (BALTIMORE)**

MELISSA HILTZ,

Plaintiff,

v.

EQUIFAX INFORMATION SERVICES,
LLC, EXPERIAN INFORMATION
SOLUTIONS, INC., TRANUNION, LLC
and VERIZON COMMUNICATIONS,
INC.,

Defendants.

Case No. 1:22-CV-00161-SAG

**DEFENDANT EQUIFAX INFORMATION SERVICES LLC'S
ANSWER TO PLAINTIFF'S COMPLAINT**

Defendant, Equifax Information Services LLC ("Equifax"), by Counsel, files its Answer to Plaintiff's Complaint ("Complaint") as follows:

PRELIMINARY STATEMENT

Equifax denies any and all allegations in the headings and/or unnumbered paragraphs in the Complaint.

ANSWER

In response to the specific allegations in the enumerated paragraphs in the Complaint, Equifax responds as follows:

1. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraphs 1 and 2.

2. Equifax admits Plaintiff purports to bring claims pursuant to the Fair Credit Reporting Act ("FCRA"). Equifax denies any allegation it violated the FCRA as alleged in

Paragraph 3.

3. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraphs 4 and 5.

4. Equifax admits it is a consumer reporting agency as defined by the FCRA. Equifax is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 6.

5. Equifax denies it is a corporation. Equifax admits the remaining allegations in Paragraph 7.

6. Equifax admits to the allegations in Paragraph 8.

7. Equifax admits it is a consumer reporting agency as defined by the FCRA. Equifax is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraphs 9 and 10.

8. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraphs 11 - 22.

9. Equifax restates its answers and defenses to Paragraphs 1 – 22.

10. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraphs 24 – 33.

11. Equifax denies any allegation it reported inaccurate information in Plaintiff's credit file as alleged in Paragraphs 34 and 35.

12. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraphs 36 and 37.

13. Equifax denies any allegation it reported inaccurate information in Plaintiff's credit file as alleged in Paragraph 38.

14. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraphs 39 - 42.

15. Equifax denies the allegations in Paragraphs 43 and 44.

16. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 45.

17. Equifax denies the allegations in Paragraphs 46 and 47.

18. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraphs 48 – 64.

19. Equifax denies any allegation it reported inaccurate information in Plaintiff's credit file as alleged in Paragraph 65.

20. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraphs 66 – 113.

21. Equifax denies any allegation it reported inaccurate information in Plaintiff's credit file as alleged in Paragraphs 114 - 116.

22. Equifax denies the allegations in Paragraphs 117 – 123.

23. Equifax denies any allegation it caused Plaintiff to suffer any damages. Equifax is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 124.

24. Equifax denies the allegations in Paragraph 125.

25. Equifax denies any allegation it caused Plaintiff to suffer any damages. Equifax is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraphs 126 - 129.

26. Equifax is without knowledge or information sufficient to form a belief as to the

truth of the allegations in Paragraphs 130 and 131.

27. Equifax denies any allegation it reported inaccurate information in Plaintiff's credit file as alleged in Paragraph 132.

28. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraphs 133 – 150.

29. Equifax denies the allegations in Paragraphs 151 and 152.

30. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraphs 153 – 158.

31. Equifax denies the allegations in Paragraph 159.

32. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraphs 160 – 162.

33. Equifax denies the allegations in Paragraph 163.

34. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraphs 164 – 174.

35. Equifax denies the allegations in Paragraph 175.

36. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 176.

37. Equifax restates its answers and defenses to Paragraphs 1 – 176.

38. Equifax admits Plaintiff purports to bring claims pursuant to the Fair Credit Reporting Act ("FCRA"). Equifax denies any allegation it violated the FCRA as stated in Paragraph 178.

39. Equifax denies the allegations in Paragraphs 179 – 186.

40. Equifax denies Plaintiff is entitled to any relief claimed in the "WHEREFORE"

Paragraph following Paragraph 186.

41. Equifax restates its answers and defenses to Paragraphs 1 – 186.

42. Equifax admits Plaintiff purports to bring claims pursuant to the Fair Credit Reporting Act (“FCRA”). Equifax denies any allegation it violated the FCRA as stated in Paragraph 188.

43. Equifax denies the allegations in Paragraphs 189 – 196.

44. Equifax denies Plaintiff is entitled to any relief claimed in the “WHEREFORE”

Paragraph following Paragraph 196.

45. Equifax restates its answers and defenses to Paragraphs 1 – 196.

46. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraphs 198 – 207.

47. Equifax restates its answers and defenses to Paragraphs 1 – 207.

48. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraphs 209 – 219.

49. Equifax admits that Plaintiff demands a trial by jury as stated in Paragraph 220.

50. Equifax denies Plaintiff is entitled to any relief claimed in the “WHEREFORE”

Paragraph following Paragraph 220.

WHEREFORE, having fully answered or otherwise responded to the allegations in Plaintiff’s Complaint, Equifax prays that:

(1) Plaintiff’s Complaint be dismissed in its entirety and with prejudice, with all costs taxed against Plaintiff;

(2) it recover such other and additional relief as the Court deems just and appropriate.

DATED: April 1, 2022

Respectfully submitted,

Clark Hill PLC

By: /s/ Leslie Carol Bender

Leslie Carol Bender

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*Counsel for Defendant Equifax Information
Services LLC*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 1, 2022, I electronically filed with the Clerk of Court the foregoing document using the CM/ECF system which will send notification of such filing to all counsel of record.

/s/ Leslie Carol Bender

Leslie Carol Bender